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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

YURIDIA CHAVEZ-HERRERA

* * * *

Case No. 2:19-cv-01327-GMN-BNW

Plaintiff.

VS.

SHAMROCK FOODS COMPANY, an Arizona foreign corporation; DOE I EMPLOYEE, DOES II through X, and ROE CORPORATIONS I through X, inclusive,

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(FIRST REQUEST)**

Pursuant to LR 6-1 and LR 26-2, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend the Discovery Deadlines in the above-captioned case for ninety (90) days as set forth below.

A. Discovery Completed to Date:

1. The FRCP 26(f) Conference was held 8/27/2019;
2. Plaintiff produced her initial FRCP 16.1 disclosures on September 4, 2019;
3. Defendants produced its initial FRCP 16.1 disclosures on September 18, 2019;
4. Plaintiff propounded its First Set of Interrogatories and First Set of Requests for

Production of Documents to Defendant Shamrock on 11/7/19;

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1 B. Discovery Remaining to Be Completed:

2 1. Defendant Shamrock needs to provide written discovery requests to the Plaintiff;

3 2. Defendant needs to propound written discovery to the Plaintiff;

4 3. Doe I Employee needs to be substituted;

5 4. Deposition of Plaintiff;

6 5. Deposition of Doe I Employee;

7 6. Deposition of Person(s) Most Knowledgeable of Defendant;

8 7. Disclosure of initial experts;

9 8. Disclosure of rebuttal experts;

10 9. Depositions of each party's experts;

11 10. Any other discovery which may be determined as relevant and necessary by the

12 parties.

13 C. Reasons for Request for Extension of Discovery Deadlines

14 The parties request this extension for multiple reasons. The Plaintiff is still treating and the
15 parties need additional time to fully access her treatment and future treatment needed. Further,
16 Plaintiff is attempting to substitute the Doe I Employee and will need additional time to propound
17 written discovery and take his/her deposition. Lastly, given the upcoming holidays, the parties
18 need additional time to retain experts. Accordingly, the parties stipulate to the following proposed
19 discovery order.

20 D. Proposed Schedule for Completing Discovery

	EVENT DEADLINE	CURRENT DATE	PROPOSED DATE
25	Last date to complete discovery:	2/5/2020	05/05/2020
26	Last date to amend pleadings and add parties:	11/7/2019	02/05/2020
27	Last date to file interim status report:	12/06/2019	03/05/2020



1 Last date to disclose experts pursuant to Fed. R. Civ. 12/06/2019 03/05/2020
2 P. 26(a)(2):
3 Last date to disclose rebuttal experts: 01/16/2020 04/15/2020
4 Last date to file dispositive motions 03/06/2020 06/04/2020
5 Last date to file joint pretrial order: 04/06/2020 07/06/2020
6 (In the event dispositive motions are filed, the date 7 for filing the joint pretrial order shall be suspended
7 until 30 days after the decision of the dispositive
8 motions.)
9 E. Current trial date

10 A Trial date has not yet been scheduled.

11 WHEREFORE, the parties respectfully request this Honorable Court adopt the foregoing
12 stipulation of the parties which will result in the new deadlines and trial setting.

13 DATED this 18 day of November, 2019.

14 DATED this 18 day of November, 2019.

15 BENSON & BINGHAM

LEWIS BRISBOIS BISGAARD & SMITH

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IT IS SO ORDERED

DATED: November 18, 2019

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BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

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